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March 15, 2019

Honorable Kenneth M. Karas
United States District Judge
United State District Court
300 Quarropas Street
White Plains, NY 10601

Re: *United States v. Tyrell Simon*, 15 Cr. 463 (KMK)

Dear Judge Karas:

I am writing to request a further, but brief, continuance of Mr. Simon's sentencing, currently scheduled for this Monday, March 18, 2019.

On March 4th I asked the Court for additional time to communicate with, Mr. Simon's attorney, Edward Bruno, in a related ("relevant conduct") state case. We have been in contact and we have identified strategies for achieving full concurrency of the federal and state cases (I believe that all parties in both cases agree that full concurrency is appropriate). This requires complex calculations involving the state and federal good time statutes, and also factoring in the likelihood of Mr. Simon's release to a halfway house for the last six months of his sentence.

Mr. Bruno intends to "conference the case" next week and we should have an answer, one way or another, as to whether or to what extent the sentences will be fully concurrent. This, in turn, will affect the sentence we ask Your Honor to impose.

In light of the above, I ask the Court to adjourn Mr. Simon's sentencing to the end of the week of March 25 or thereafter, specifically, March 28th, 29th, or any date during the first two weeks of April.

I have communicated with AUSA Won Shin and he stated that he opposes any further adjournments of the sentencing because of the length of time that sentencing has been pending.

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Thank you for your consideration.

Very truly, yours,

S/

SUSAN C. WOLFE